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7 SEVERANCE BENEFIT PLAN

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DOUGLAS COATES,  
Plaintiff,  
v.  
ATIEVA USA, INC. SEVERANCE  
BENEFIT PLAN,  
Defendant.

CASE NO. 3:20-CV-04176-SK

**DECLARATION OF J. ROBERT  
SHUMAN, JR. IN SUPPORT OF  
STIPULATED PROTECTIVE ORDER**

I, J. ROBERT SHUMAN, JR., declare:

1. I am an attorney licensed by the Bar of the State of California, and am admitted to practice  
before this Court.

2. I am a partner at the law firm of Shuman Snyder LLP, counsel of record for  
Defendant ATIEVA USA, INC. SEVERANCE BENEFIT PLAN and am one of the attorneys  
responsible for the defense of this action. I have personal knowledge of the facts contained herein,  
and if called as a witness, I could and would testify competently thereto.

3. The Stipulated Protective Order filed herewith is identical to the model stipulated  
protective order for standard litigation as provided by the Court, except for the addition of case

1 identifying information.

2 I declare under penalty of perjury under the laws of the State of California that the  
3 foregoing is true and correct, and that I executed this declaration on September 30, 2020, at  
4 Menlo Park, California.

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6 /S/  
7 J. ROBERT SHUMAN, JR.  
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